

MAR 27 1995

**CERTIFIED MAIL**

Return Receipt Requested

Article Number: P 009 582 301

Mr. Byron Skiles  
Plant Engineer  
Waterloo Industries, Inc.  
300 Ansborough Avenue  
Waterloo, IA 50704

  
R00364278  
RCRA RECORDS CENTER

Dear Mr. Skiles:

Re: Information on Solid Waste Management Units (SWMUs)  
Waterloo Industries, Inc.  
Waterloo, IA  
EPA RCRA ID No. IAD005277959

Request for Information

The Hazardous and Solid Waste Amendments of 1984 to the Resource Conservation and Recovery Act (RCRA) authorize the U. S. Environmental Protection Agency (EPA) to determine if any hazardous wastes or hazardous constituents have been released to any environmental media from Solid Waste Management Units (SWMUs). All SWMUs, including units used in the past, are considered in our determination. We have scheduled a RCRA Facility Assessment (RFA) in order to determine if releases have occurred. The RFA can provide the basis to require corrective action for both actual or potential releases. This request for information is necessary to prepare for a visual site inspection of your facility and the SWMUs.

Section 3007 of RCRA, 42 USC Section 6927, authorizes EPA to require that information be provided for the purpose of determining compliance with the federal hazardous waste regulations. Failure to provide the information requested in the enclosure to this letter may subject Waterloo Industries, Inc. to an enforcement action under Section 3008 of RCRA, 42 USC Section 6928. Enforcement actions may include the assessment of penalties of up to \$25,000 for each day of noncompliance.

Your facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to, or review by, EPA, a cover sheet,

RCRA:IOWA:LAHM,disabr5:SL:RFAs:WATRLOIND.SMU:br 03/17/95

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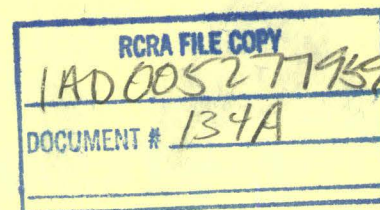
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stamped or printed legend, or other suitable form of notice employing language such as "*trade secret*," "*proprietary*," or "*company confidential*." Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by the means authorized by the procedures specified in Title 40 Code of Federal Regulations (CFR) Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

Please note that all information must be complete, accurate, and must include a certification by a principal corporate officer. An example of a certification statement follows our information request. Your response is due within thirty (30) days of your receipt of this letter. Please send it to the attention of, Ms. Alma Moreno Lahm RCRA/IOWA, at the letterhead address. If you have any questions regarding this matter, please contact Alma at (913) 551-7380. Thank you for your cooperation in this matter.

Sincerely,

James V. Callier  
Chief, IOWA Section  
RCRA Branch

cc: Joseph Obr, (w/ encl)  
Iowa Department of Natural Resources



### REQUEST FOR INFORMATION

Pursuant to the provisions of Section 3007 of RCRA, EPA hereby requests that you provide the following information and copies of the following documents, to the extent that such information is available. Note that for the purposes of the following requests, the following definitions apply.

- ▶ A **"Solid Waste Management Unit (SWMU)"** is defined as any unit from which hazardous waste or hazardous constituents might migrate. This definition applies to active as well as inactive units containing either hazardous wastes or solid wastes, or both. Examples of SWMUs include: landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, above and below ground tanks (including 90-day accumulation tanks), transfer stations, and waste recycling operations. In addition, the Agency has interpreted the term to apply to areas associated with production processes which have become contaminated as a result of routine and systematic releases of hazardous waste or hazardous constituents (a product may become a waste if it is discarded or abandoned).
- ▶ **"Hazardous constituents"** include those constituents listed in Appendix VIII to Title 40 Code of Federal Regulations (CFR) Part 261.
- ▶ **"Hazardous waste"** means those solid wastes identified as hazardous waste in 40 CFR Part 261 and defined by Section 1004(5) of RCRA, 42 USC Section 6903(5).
- ▶ **"Facility"** includes all contiguous property under the control of the owner or operator on November 8, 1984, on which units subject to permitting are located.
- ▶ **"Release"** includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, but excluding releases otherwise permitted or authorized under the law (e.g., NPDES permitted discharges).
- ▶ The terms **"furnish," "describe,"** or **"indicate"** mean turning over to EPA either originals or duplicate copies of the requested information in the possession, custody, and/or control of the owner or operator of the facility. Where specific documents do not exist which are responsive to an information request but such information is known, you may respond to the question with a written response, without providing documents.
- ▶ **"Hazardous substance"** means (a) any substance designated pursuant to section 311(b)(2)(A) of the Federal Water Pollution Control Act; (b) any element, compound, mixture, solution, or substance designated pursuant to Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of



RCRA (but not including any waste the regulation of which under RCRA has been suspended by Act of Congress); (d) any toxic pollutant listed under Section 307(a) of the Federal Water Pollution Control Act; (e) any hazardous air pollutant listed under Section 112 of the Clean Air Act; and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 7 of the Toxic Substances Control Act.

1. Provide a topographic map showing the facility property boundaries and the location of all known SWMUs whether currently in operation or not. This map should be drawn to a scale of 1 inch equals 200 feet and clearly indicate the location and size of all SWMUs. Alternate scales are acceptable if they clearly show all features requested. If there are no known SWMUs (e.g. surface impoundments, tanks, landfills, waste piles, etc.), so indicate in your response to EPA. There is no need to go on further with the response if this is the case.
  - a. For each SWMU identified, describe the type of unit (e.g., container, storage area, landfill, waste pile, etc.), and the dimensions of the unit.
  - b. For each SWMU identified, indicate the beginning and ending dates that the unit was in use.
  - c. For each SWMU identified, describe the quantity and type(s) of wastes managed in the unit.
  - d. For each SWMU identified, indicate the dates, quantity, and type(s) of any known release(s) of hazardous wastes or hazardous constituents from that SWMU.
  - e. Provide all information, data, and documentation concerning any releases occurring from a SWMU at your facility, including the results of any soil, air or water (ground or surface) testing that indicates presence of hazardous waste or hazardous constituents.
  - f. For each SWMU identified, describe any corrective action measures and any mitigating measures (e.g., replacement of water supplies) which have been completed or are currently underway to address any release(s).
2. On the map provided pursuant to item number 1 above, clearly indicate the location of all known units at your facility, other than SWMUs, whether currently in operation or not, which hold or have held hazardous substances and from which there have been releases of hazardous wastes or hazardous constituents.
  - a. For each unit identified, describe the type of unit (e.g., production area, underground storage tank) and the dimensions of the unit.

- b. For each unit identified, indicate the beginning and ending dates that the unit was in use.
  - c. For each unit identified, describe the quantity and type(s) of hazardous substances managed in the unit.
  - d. For each unit identified, indicate the dates, quantity, and type(s) of any known release(s) of hazardous wastes or hazardous constituents.
  - e. Provide all information, data, and documentation concerning any releases occurring from a unit at your facility, including the results of any soil, air or water (ground or surface) testing that indicates presence of hazardous waste or hazardous constituents.
  - f. For each unit identified, describe any corrective action measures and any mitigating measures (e.g., replacement of water supplies) which have been completed or are currently underway to address any release(s).
3. On the map provided pursuant to item number 1 above, clearly indicate the location of all known water wells, e.g., drinking water, irrigation, groundwater monitoring. Please provide all permitted discharges, e.g., NPDES, air permits, etc.
4. On the map provided pursuant to item number 1 above, clearly indicate the location of all surface water, e.g., rivers, streams, lakes, ponds, retention basins, etc.



CERTIFICATION TO REQUEST FOR INFORMATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that, to the best of my knowledge, the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\_\_\_\_\_  
NAME (print or type)

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
SIGNATURE

Sworn to before me  
this day of \_\_\_\_\_

\_\_\_\_\_  
Notary Public

P 009 582 301



**Receipt for  
Certified Mail**

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Mr. Byron Skiles, Plant Engineer  
Waterloo Industries, Inc.  
300 Ansborough Avenue  
Waterloo, IA 50704

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PS Form 3800, June 1991

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CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES (see front).**

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier (no extra charge).
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

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